

PETER B. MORRISON (SBN 230148)
peter.morrison@skadden.com
ZACHARY M. FAIGEN (SBN 294716)
zack.faigen@skadden.com
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
2000 Avenue of the Stars, Suite 200N
Los Angeles, California 90067
Tel: (213) 687-5000

ALEXANDER C. DRYLEWSKI (*admitted pro hac vice*)
alexander.drylewski@skadden.com
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
One Manhattan West
New York, New York 10001
Telephone: (202) 371-7000

*Attorneys for Defendant
Paradigm Operations LP*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMANDA HOUGHTON; CHARLES DOUGLAS; and SUSAN FRANKLIN,

Plaintiffs.

V.

COMPOUND DAO; ROBERT LESHNER; GEOFFREY HAYES; AH CAPITAL MANAGEMENT, LLC; POLYCHAIN ALCHEMY, LLC; BAIN CAPITAL VENTURES (GP), LLC; GAUNTLET NETWORKS, INC.; PARADIGM OPERATIONS LP.

Defendants.

CASE NO.: 3:22-CV-07781-WHO

Judge: Hon. William H. Orrick
Complaint Filed: December 8, 2022

**JOINT STIPULATION AND
[PROPOSED] ORDER
(1) CONTINUING CASE
MANAGEMENT CONFERENCE AND
(2) EXTENDING TIME FOR
DEFENDANTS TO RESPOND TO
MOTION FOR LEAVE TO FILE
AMENDED COMPLAINT**

1 Plaintiffs Amanda Houghton, Charles Douglas, and Susan Franklin, individually and on
 2 behalf of all others similarly situated ("Plaintiffs"), and Defendants Robert Leshner, Geoffrey Hayes,
 3 AH Capital Management, LLC, Polychain Alchemy, LLC, Bain Capital Ventures (GP), Gauntlet
 4 Networks, Inc., and Paradigm Operations LP ("Defendants" and, with Plaintiffs, the "Parties")
 5 hereby stipulate and agree as follows:

6 **WHEREAS**, on May 7, 2024, the Court set a Further Case Management Conference for
 7 December 3, 2024 at 2:00 p.m. (ECF 160);

8 **WHEREAS**, on November 4, 2024, Plaintiffs filed a Motion for Leave to Amend First
 9 Amended Complaint (ECF 202 ("Motion for Leave"));

10 **WHEREAS**, per the Parties' so-ordered stipulation, Defendants' response to the Motion for
 11 Leave is currently due December 26, 2024 (*see* ECF 212, 213); and

12 **WHEREAS**, the Parties have met and conferred and agree that, in light of the upcoming
 13 holidays and the press of business, the Further Case Management Conference currently set for
 14 December 3, 2024 should be continued, and the deadline for Defendants to respond to the Motion
 15 for Leave should be extended;

16 **THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, pursuant to Civil Local
 17 Rules 6-1(b), 6-2 and 7-12, by and between the undersigned counsel for the undersigned parties,
 18 subject to Court approval, as follows:

19 1. The Further Case Management Conference currently set for December 3, 2024 shall
 20 be continued to January 7, 2025 at 2:00 p.m.

21 2. The deadline for Defendants to respond to the Motion for Leave shall be extended to
 22 January 22, 2025.

23 DATED: November 26, 2024

24 */s/ Nicholas N. Spear*

25 STEVEN G. SKLAVER (237612)
 ssklaver@susmangodfrey.com
 26 OLEG ELKHUNOVICH (269238)
 oelkhunovich@susmangodfrey.com
 27 ROHIT D. NATH (316062)
 rnath@susmangodfrey.com

1 NICHOLAS N. SPEAR (304281)
 2 nspear@susmangodfrey.com
 3 SUSMAN GODFREY L.L.P.
 4 1900 Avenue of the Stars, Suite 1400
 Los Angeles, California 90067-6029
 Telephone: (310) 789-3100
 Facsimile: (310) 789-3150

5 TAYLOR H. WILSON, JR. (pro hac vice)
 6 twilson@susmangodfrey.com
 SUSMAN GODFREY L.L.P.
 7 1000 Louisiana Street, Suite 5100
 Houston, Texas 77002
 Telephone: (713) 651-9366
 Facsimile: (713) 654-6666

8
 9 JASON HARROW (308560)
 10 jason@gerstein-harrow.com
 GERSTEIN HARROW LLP
 11 3243B S. La Cienega Blvd.
 Los Angeles, California 90016
 Telephone: (323) 744-5293

12
 13 JAMES CROOKS (pro hac vice)
 14 jamie@fairmarklaw.com
 MICHAEL LIEBERMAN (pro hac vice)
 15 FAIRMARK PARTNERS, LLP
 1001 G Street NW, Suite 400 East
 Washington, DC 20001
 Telephone: (619) 507-4182

16
 17 CHARLES GERSTEIN (pro hac vice)
 18 charlie@gerstein-harrow.com
 GERSTEIN HARROW LLP
 19 1001 G Street NW, Suite 400 East
 Washington, DC 20001
 Telephone: (202) 670-4809

20 *Attorneys for Plaintiffs Amanda Houghton, Charles Douglas,*
and Susan Franklin
 21

22 CLEARY GOTTLIEB STEEN & HAMILTON LLP

23 /s/ Samuel Levander
 24 Jennifer Kennedy Park (SBN 344888)
 jkpark@cgsh.com
 1841 Page Mill Rd Suite 250
 Palo Alto, CA 94304
 Tel: +1 (650) 815-4100

25
 26 Roger A. Cooper (Admitted *pro hac vice*)
 racooper@cgsh.com
 27 Jared Gerber (Admitted *pro hac vice*)
 28

1 jgerber@cgsh.com
 2 Samuel Levander (Admitted *pro hac vice*)
 3 slevander@cgsh.com
 4 One Liberty Plaza
 5 New York, NY 10006
 6 Tel: +1 (212) 225-2000

7 *Attorneys for Defendant Polychain Alchemy, LLC*
 8

9 LATHAM & WATKINS LLP
 10

11 /s/ Susan E. Engel
 12 Matthew Rawlinson (SBN 231890)
 13 matt.rawlinson@lw.com
 14 140 Scott Drive
 15 Menlo Park, CA 94025
 16 Tel: +1 (650) 328-4600

17 Morgan E. Whitworth (SBN 304907)
 18 morgan.whitworth@lw.com
 19 505 Montgomery Street, Suite 2000
 20 San Francisco, CA 94111
 21 Tel: +1 (415) 391-0600

22 Douglas K. Yatter (SBN 236089)
 23 douglas.yatter@lw.com
 24 Benjamin Naftalis (Admitted *pro hac vice*)
 25 benjamin.naftalis@lw.com
 26 1271 Avenue of the Americas
 27 New York, NY 10020
 28 Tel: +1 (212) 906-1200

29 Susan E. Engel (Admitted *pro hac vice*)
 30 susan.engel@lw.com
 31 555 Eleventh Street, NW, Suite 1000
 32 Washington, D.C. 20004
 33 Tel: +1 (212) 637-2200

34 *Attorneys for Defendant AH Capital Management, L.L.C.*
 35

36 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
 37

38 /s/ Peter B. Morrison
 39 Peter B. Morrison (SBN 230148)
 40 peter.morrison@skadden.com
 41 Zachary M. Faigen (SBN 294716)
 42 zack.faigen@skadden.com
 43 2000 Avenue of the Stars, Suite 200N
 44 Los Angeles, California 90067
 45 Tel: +1 (213) 687-5000

1 Alexander C. Drylewski (Admitted *pro hac vice*)
 2 alexander.drylewski@skadden.com
 3 One Manhattan West
 4 New York, NY 10001
 5 Tel: +1 (212) 735-3000

6 *Attorneys for Defendant Paradigm Operations LP*

7 JENNER & BLOCK LLP

8 */s/ Kayvan B. Sadeghi*
 9 Kayvan B. Sadeghi (Admitted *pro hac vice*)
 10 ksadeghi@jenner.com
 11 1155 Avenue of the Americas
 12 New York, NY 10036
 13 Tel: +1 (212) 891 1600

14 H. An N. Tran (267685)
 15 atran@jenner.com
 16 525 Market Street, 29th Floor
 17 San Francisco, CA 94105
 18 Tel: +1 (415) 293-5933

19 *Attorneys for Defendant Bain Capital Ventures (GP), LLC*

20 MORRISON COHEN LLP

21 */s/ Jason Gottlieb*
 22 Jason Gottlieb (Admitted *pro hac vice*)
 23 jgottlieb@morrisoncohen.com
 24 Michael Mix (Admitted *pro hac vice*)
 25 mmix@morrisoncohen.com
 26 Vani Upadhyaya (Admitted *pro hac vice*)
 27 vupadhyaya@morrisoncohen.com
 28 909 Third Avenue
 New York, NY 10022
 Tel: +1 (212) 735-8600

29 LONDON & NAOR P.C.
 30 Ellen London (SBN 325580)
 31 elondon@londonnaor.com
 32 1999 Harrison St., Suite 2010
 33 Oakland, CA 94612
 34 Tel: +1 (415) 862-8494

35 *Attorneys for Defendants Robert Leshner, Geoffrey Hayes,*
 36 *and Gauntlet Networks, Inc.*

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

2 Dated: _____, 2024

3 By: _____

4 HONORABLE WILLIAM H. ORRICK III
5 UNITED STATES DISTRICT JUDGE
6
7

8 **FILER'S ATTESTATION**

9 I, Peter B. Morrison, am the ECF User whose ID and password are being used to file this
10 Joint Stipulation (1) Continuing Case Management Conference And (2) Extending Time For
11 Defendants To Respond To Motion For Leave To File Amended Complaint. In compliance with
12 Civil Local Rule 5-1(i), I hereby attest that concurrence in the filing of this document have been
13 obtained from each of the other signatories.

15
16 By: /s/ Peter B. Morrison
17 Peter B. Morrison
18
19
20
21
22
23
24
25
26
27
28